1 2 3 4 5	MACE J. YAMPOLSKY, LTD. MACE J. YAMPOLSKY, ESQ. Nevada Bar No.: 001945 625 S. Sixth Street Las Vegas, Nevada 89101 Tel: (702) 385-9777 Fax: (702) 385-3001 mace@macelaw.com Attorney for Defendant MICKEY GINES		
6	UNITED STATES DISTRICT COURT		
7	DISTRICT OF NEVADA		
8	UNITED STATES OF AMERICA	) Case No.: 2:13-cr-355-GMN-CWH	
9   10	Plaintiff,	) STIPULATION TO MODIFY ) CONDITIONS OF PRETRIAL ) RELEASE AND SUPERVISION	
11	vs.	) RELEASE AND SUI EXVISION	
12	MICKEY GINES,	)	
13 14	Defendant.	) _) _)	
15			
16	United States Attorney, by and through Daniel J. Cowhig, Assistant United States Attorney, and		
17	Defendant MICKEY GINES, by and through his counsel, Mace J. Yampolsky, Esq., that:		
18 19	1. Defendant MICKEY GINES' conditions of pre-trial release and supervision shall be		
20	modified so that he may travel outside of the District of Nevada to Colorado Springs,		
21	Colorado, on the weekend of August 5, 2016 through August 8, 2016, for the purpose		
22	of attending his 25 <sup>th</sup> high school reunion.		
23	2. While in Colorado Springs, Colorado for the weekend, Defendant MICKEY GINES		
24	will be staying with his first cousin Jennifer Nededog. Ms. Nededog resides at the		
25	address of 3005 Moonbeam Circ	cle North, Colorado Springs, CO 80916.	

## Case 2:13-cr-00355-GMN-CWH Document 269 Filed 08/02/16 Page 2 of 3

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3. Defendant MICKEY GINES plans on traveling from Las Vegas, Nevada, to Colorado Springs, Colorado via plane but has thus far refrained from purchasing airfare until such time as the Court approves the instant travel request. In the event of approval, flight information will be immediately forwarded to Pretrial Services Officer Samira Barlow as soon as it becomes available.

- 4. Defendant MICKEY GINES will continue to be subject to any and all prohibition(s) pertaining to his use of the above-identified Smart Phone, as well as the other related limitations on his use of the Internet and electronic mail and in all other respects.
- 5. United States Pretrial Services Officer Samira Barlow and Assistant United States Attorney for the District Of Nevada, Daniel J. Cowhig, Esq., are aware of and have no opposition to this limited and finite modification of Defendant MICKEY GINES' pretrial travel restrictions.

DATED this  $25^{th}$  day of July, 2016.

## OFFICE OF THE U.S. ATTORNEY

/s/ Daniel Cowhig

Daniel J. Cowhig Assistant United States Attorney

333 Las Vegas Blvd., S., No. 5000

Las Vegas, Nevada 89101

**Counsel for Plaintiff:** 

United States of America

MACE J. YAMPOLSKY, LTD.

/s/ Mace J. Yampolsky, Esq.

Mace J. Yampolsky, Esq. 625 South Sixth Street

Las Vegas, Nevada 89101

**Counsel for Defendant:** 

Mickey Gines

## **ORDER**

## IT IS THEREFORE ORDERED that:

- 1. Defendant MICKEY GINES' conditions of pre-trial release and supervision shall be modified so that he travel to Colorado Springs, Colorado during the weekend spanning August 5, 2016 through August 8, 2016, for the purpose of attending his 25<sup>th</sup> high school reunion.
- Defendant MICKEY GINES will continue to be subject to the prohibitions
   pertaining to his use of internet and email in all other respects as he has thus far.
   DATED this 2nd day of August, 2016.

United States Magistrate Judge